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PUBLIC UTILITY COMMISSION
BEFORE THE FILING CLERK

PETITION OF COMMISSION STAFF TO
REVOKE THE RETAIL ELECTRIC
PROVIDER CERTIFICATION OF
TEXREP1, LLC d/b/a EPCOT
ELECTRIC, EPCOT, EPCOT ENERGY

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PUBLIC UTILITY COMMISSION
OF TEXAS

MOTION TO INTERVENE

Texas-New Mexico Power Company (TNMP) files this Motion to Intervene in the above proceeding pursuant to P.U.C. PROC. R. 22.103 and 22.104, and respectfully shows as follows:

Authorized Representatives

The name, address, telephone number of TNMP's authorized legal representative is:

Scott Seamster
Corporate Counsel
PNM Resources, Inc.
225 E. John Carpenter Freeway, Suite 1500
Irving, Texas 75062-2282
Tel: 469-484-8577 Fax: 469-484-8033
scott.seamster@pnmresources.com

The name, address, telephone number of TNMP's authorized regulatory representative is:

Stacy Whitehurst
Vice President Regulatory Policy
225 E. John Carpenter Freeway, Suite 1500
Irving, Texas 75062-2282
Tel: 469-484-8586 Fax: 469-484-8032
stacy.whitehurst@tnmp.com

Copies of all correspondence, pleadings, and other document should be served on Mr. Seamster at the address shown above.

Standing to Intervene


Texas-New Mexico Power Company is a Transmission Distribution Utility serving diverse areas of the State of Texas and is an electric utility and public utility as defined in PURA.

TEXREP1, LLC d/b/a EPCOT Electric, EPCOT, EPCOT Energy (TEXREP1) is a certificated Retail Electric Provider ("REP") serving each of TNMP's service areas, contracted with TNMP for delivery service under the rates, terms, and conditions of its tariff for Retail Delivery Service ("Tariff"). Furthermore, TEXREP1 has failed to pay over \$ 29,995.80 in charges to TNMP for service supplied under referenced Tariffs. TNMP therefore has a justicable interest, which may be adversely affected by the outcome of these proceedings and has standing to intervene.

WHEREFORE, premises considered, TNMP respectfully moves to be granted party status in this proceeding and for such other and further relief to which it may be justly entitled.

Respectfully submitted,

TEXAS-NEW MEXICO POWER COMPANY



SCOTT SEAMSTER

State Bar No. 00784939

Corporate Counsel

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Irving, Texas 75062-2282

T: 469-484-8577 F: 469-484-8033

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Intervene was served on all parties of record on July 26, 2012 by facsimile transmission, electronic transmission, or first class mail.



Counsel